

EXHIBIT “J”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -
GARY B. FREEDMAN, :
ESQUIRE, Administrator : NO.
of the ESTATE OF : 2:13-cv-3145-CDJ
ABRAHAM STRIMBER, :
deceased :
and :
BRACHA STRIMBER, :
 :
 :
Plaintiffs, :
 :
v. :
 :
STEVEN FISHER, M.D., :
et al., :
 :
 :
Defendants. :
- - -

Tuesday, March 18, 2014
- - -

Videotape deposition of
MARGO E. TURNER, M.D., taken pursuant to
notice, was held at the law offices of
Christie, Pabarue & Young, 1880 JFK
Boulevard, 10th Floor, Philadelphia,
Pennsylvania, commencing at 10:40 a.m.,
on the above date, before Amy M. Murphy,
a Professional Court Reporter and Notary
Public there being present.
- - -

MAGNA LEGAL SERVICES
(866) 624-6221
www.MagnaLS.com

MAGNA LEGAL SERVICES

Page 2

1 APPEARANCES:

2 LAW OFFICE OF LEON AUSSPRUNG, MD, LLC
 3 BY: LEON AUSSPRUNG, M.D., J.D., LL.M.,
 4 ESQUIRE

5 One Commerce Square
 6 2005 Market Street, Suite 2300
 7 Philadelphia, Pennsylvania 19103
 8 267-809-8250
 9 Representing the Plaintiffs

10 LAW OFFICE OF LEON AUSSPRUNG, MD, LLC
 11 BY: JAMES HOCKENBERRY, ESQUIRE

12 One Commerce Square
 13 2005 Market Street, Suite 2300
 14 Philadelphia, Pennsylvania 19103
 15 267-809-8250
 16 Representing the Plaintiffs

17 CHRISTIE FABARUE AND YOUNG
 18 BY: JAMES A. YOUNG, ESQUIRE

19 1880 JFK Boulevard, 10th Floor
 20 Philadelphia, Pennsylvania 19103
 21 215-587-1625
 22 Representing the Defendant,
 23 Kristina Martinez, Dr. Turner, Abington
 24 Hospital

POST & SCHELL, PC
 BY: DONALD N. CAMHI, ESQUIRE

Four Penn Center
 1600 JFK Boulevard
 Philadelphia, Pennsylvania 19103
 215-587-1015
 Representing the Defendant, Steven
 Fisher, M.D., Abington Emergency
 Physician Associates

Page 4

1 ---
2 INDEX
3 ---
4

5 Testimony of: MARGO E. TURNER, M.D. PAGE

6 By Mr. Aussprung 7
78 ---
9 EXHIBITS
10 ---
11

12 NO. DESCRIPTION PAGE

13 Turner-1 Curriculum Vitae 11

14 Turner-2 Physician Employment
15 Agreement 1916 Turner-3 Delineation of
17 Privileges 2218 Turner-4 Emergency Department
19 Record 4120 Turner-5 Emergency Department
21 Record 5122 Turner-6 Department of Radiology
23 Record 71

24 Turner-7 History & Physical 79

Turner-8 Consultation Report 98

Turner-9 Nursing Note 101

Turner-10 Nursing Note 107

Page 3

1 APPEARANCES CONTINUED....

2 GERMAN, GALLAGHER & MURTAGH, PC
 3 BY: CHILTON G. GOEBEL, III, ESQUIRE

4 The Bellevue
 5 200 S. Broad Street, Suite 500
 6 Philadelphia, Pennsylvania 19102
 7 215-875-4023
 8 Representing the Defendant, Dr. Muttreja

16 ALSO PRESENT:

17 MATT MERIN - VIDEOGRAPHER
18 ---
19
20
21
22
23
24

Page 5

1 ---
2 DEPOSITION SUPPORT INDEX
3 ---
4

5 Direction to Witness Not to Answer

6 Page Line Page Line Page Line

7 None

10 Request for Production of Documents

11 Page Line Page Line Page Line

12 None

15 Stipulations

16 Page Line Page Line Page Line

17 None

20 Question Marked

21 Page Line Page Line Page Line

22 None
23
24

Page 54

1 Q. Well, does morphine only
2 treat pain in the abdomen?
3 A. It does not.
4 Q. Okay.
5 A. But the indication for the
6 pain was not for chest pain. The
7 indication for the morphine was abdominal
8 pain in the ER.
9 Q. Do you believe that the
10 patient never had any chest pain?
11 A. I believe he reported he had
12 chest pain to the triage nurse.
13 Q. Do you believe the patient
14 never had any chest pain?
15 A. Do I believe the patient
16 never had any --
17 Q. Never actually had chest
18 pain.
19 A. I believe the patient had
20 chest pain.
21 Q. And why do you believe that?
22 A. I don't have any reason to
23 doubt what he spoke to the triage nurse
24 about.

Page 55

1 Q. And in fact, you now know
2 today that he had a thoracic aortic
3 aneurysm; correct?
4 A. I do.
5 Q. And that would be consistent
6 with chest pain; correct?
7 A. That would be.
8 Q. And then this had some other
9 things in it. So after it has the two
10 diagnoses it says, IP Area Request:
11 Observation, dash, Telemetry.
12 What does that mean?
13 A. IP probably means inpatient
14 area requested. Observation status is
15 the status the patients are admitted to
16 for the evaluation of symptoms that are
17 felt to require a less than 24-hour
18 evaluation, observation.
19 Q. So he went to an inpatient
20 observation area?
21 A. That is correct.
22 Q. He didn't go to, like, a
23 medical floor though?
24 A. He went to a medical floor.

Page 56

1 He went to a medical floor. He went to
2 telemetry, but he went in under
3 observation status.
4 Q. Meaning the expectation was
5 he would be less than 24 hours?
6 A. Correct.
7 Q. Then it says, not an AO
8 admission. What does that mean?
9 A. Not an admitting resident
10 service, not a resident service
11 admission.
12 Q. Okay. Meaning that it was
13 being covered by you as the unreferred
14 service?
15 A. That's correct.
16 Q. Then the next order, you
17 said that's a call to the floor, to the
18 nurse about him coming up?
19 A. The next -- the next request
20 time of 14:29?
21 Q. Right.
22 A. Observation, telemetry,
23 admit.
24 Q. And there's an admitting bed

Page 57

1 assigned, 3H02?
2 A. Yes. That's an admission.
3 Q. So, that's a call to an
4 administrative person about finding a
5 bed?
6 A. To the bed, to the board,
7 yes.
8 Q. Do you have any
9 understanding as to whether or not you
10 saw the patient before or after there was
11 a decision to admit the patient to the
12 observation area?
13 A. Yes.
14 Q. What's your understanding?
15 A. The decision to admit is
16 made and then I'm called.
17 Q. So you believe that the
18 decision to admit to the observation
19 telemetry unit was made by whom?
20 A. It's usually made by the
21 emergency unit physician.
22 Q. You did not make that
23 decision for Mr. Strimber?
24 A. No.